

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

EMILIO RODRIGUEZ MENDEZ
DEBTOR(S)

CITIBANK N.A (CITI)

VS

EMILIO RODRIGUEZ MENDEZ

ALEJANDRO OLIVERAS
CHAPTER 13 TRUSTEE

RESPONDENT (S)

CASE NUMBER: 10-04317 SEK

CHAPTER 13

Motion for Relief from stay pursuant to 11
U.S.C §362 (d)

ANSWER MOTION RELIEF OF AUTOMATIC STAY

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That CITI filed a Motion of Relief from Stay stating debtors post petition arrears with mortgage loan.
2. Debtor is submitting evidence of being current with post petition payments. (See evidence attached)

WHEREFORE, it is respectfully requested to this Honorable Court to deny Relief of Automatic from Stay filed by Citi.

I HEREBY CERTIFY: that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to Chapter 13 Trustee, Mrs. Vanessa M Torres Quiñones, Esq. and we sent copy of this document of this document through regular mail to Debtor(s) and all non CM/ECF participants interested parties to their address listed on the master address list.

IN SAN JUAN, PUERTO RICO, this 27TH day of October of 2010.

RESPECTFULLY SUBMITTED.

JPC LAW OFFICE

Jose M Prieto Carballo, Esq
P.O. Box 363565
San Juan, P.R. 00936-3565
Tel (787) 607-2066 & Tel (787) 607-2166
jpc@jpcclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

NEREIDA CUEVAS-HERNANDEZ
CORREO GENERAL DE CAROLINA
BOX 8173
CAROLINA, PR 00985

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101-7147/2215

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Citi mortgage, inc. \$2320.00
dos mil trescientos veinte con 00/100

1st Bank

SUC. PLAZA CAROLINA 50
CAROLINA, PUERTO RICO

0770542686-9
casa

Nereida Cuevas Hernandez

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Harland Clarke